IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:

Kevin Corcoran and Beverly L. Corcoran,

Debtors,

Select Portfolio Servicing, Inc. as servicing agent for Wells Fargo Bank Minnesota, N.A. as Trustee, formerly known as Norwest Bank Minnesota, NA as Trustee for Certificate Holders of SACO I Inc., Series 1999-3,

Movant,

VS.

Kevin Corcoran and Beverly L. Corcoran,

Debtors / Respondents,

and

WILLIAM C. MILLER, Esq.,

Trustee / Respondent.

Chapter 13

Case No.: 19-14500-elf

Hearing Date: January 26, 2021

Time: 9:30 a.m.

NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE

Select Portfolio Servicing, Inc. as servicing agent for Wells Fargo Bank Minnesota, N.A. as Trustee, formerly known as Norwest Bank Minnesota, NA as Trustee for Certificate Holders of SACO I Inc., Series 1999-3 has filed a Motion for Relief from the Automatic Stay with the Court for leave to enforce its rights as determined by state and/or other applicable law with regard to real property.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney).

- 1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before **January 21, 2021**, you or your attorney must do <u>all</u> of the following:
 - (a) file an answer explaining your position at:

United States Bankruptcy Court Eastern District of Pennsylvania Office of the Clerk 900 Market Street, Suite 400 Philadelphia, PA 19107 (b) mail a copy to the Movant's attorney:

Andrew M. Lubin, Esquire Milstead & Associates, LLC 1 East Stow Road Marlton, NJ 08053 Phone No.: 856-482-1400 Fax No.: 856-482-9190

(c) mail a copy to the Chapter 13 Trustee:

WILLIAM C. MILLER, Esq. Chapter 13 Trustee P.O. Box 1229 Philadelphia, PA 19105

- 2. If you or your attorney do not take the steps described in paragraphs 1(a), 1(b) and 1(c) above and attend the hearing, the court may enter an order granting the relief requested in the Motion.
- 3. A hearing on the motion is scheduled to be held before the Honorable Eric L. Frank on **January 26, 2021 at 9:30 a.m.** in Courtroom 1 of the Robert N.C. Nix, Sr. Federal Courthouse, 900 Market Street, Philadelphia, PA 19107.
- 4. If a copy of the Motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).
- 5. You may contact the Bankruptcy Clerk's office at 215-408-2800 to find out whether the hearing has been cancelled because no one filed an answer to the Motion.

Respectfully submitted, MILSTEAD & ASSOCIATES, LLC

DATED: January 4, 2021

/s/Andrew M. Lubin
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Attorneys for Movant